

1 Sharon Butler, as Guardian ad Litem for  
2 Brooke Alexis Love, a minor, In Propria Persona  
3 %5990 Sepulveda Boulevard, Suite #330  
4 Van Nuys, California 91411-2523  
(818)779-1720 phone  
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5 Creditor Brooke Alexis Love, a minor, by and through her Guardian ad Litem, Sharon Butler, In  
6 Propria Persona

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8  
9 **UNITED STATES BANKRUPTCY COURT**  
10 **SOUTHERN DISTRICT OF NEW YORK**

11  
12 In re:

13 **MOTORS LIQUIDATION COMPANY**  
14 **f/k/a GENERAL MOTORS**  
**CORPORATION, et al.,**

15 Debtors.  
16  
17  
18  
19

Chapter 11

Case No.: 09-50026 (REG)  
(Jointly Administered)

**NOTICE OF MOTION BY CREDITOR,  
BROOKE ALEXIS LOVE, A MINOR,  
BY AND THROUGH HER GUARDIAN  
AD LITEM, SHARON BUTLER, FOR  
RELIEF FROM AUTOMATIC STAY  
TO ALLOW THE CONTINUED  
PURSUIT OF AN INSURED  
PERSONAL INJURY ACTION AND  
REQUEST FOR RULE 9011  
SANCTIONS, [CERTIFICATE OF  
CONFERENCE FILED  
CONCURRENTLY HEREWITH]**

20 **NOTICE OF MOTION BY CREDITOR, BROOKE ALEXIS LOVE, A MINOR, BY AND**  
21 **THROUGH HER GUARDIAN AD LITEM, SHARON BUTLER, FOR RELIEF**  
22 **FROM AUTOMATIC STAY TO ALLOW THE CONTINUED**  
**PURSUIT OF AN INSURED PERSONAL INJURY ACTION AND REQUEST FOR**  
**RULE 9011 SANCTIONS**

23 **PLEASE TAKE NOTICE** that upon the Motion of Creditor, Brooke Alexis Love, a  
24 **minor, by and through her Guardian ad Litem, Sharon Butler, ("Movant")** for relief from  
25 the automatic stay pursuant to 11 U.S.C. Sec. 362(d)(1), a hearing will be held before the  
26 **Honorable Robert E. Gerber, United States Bankruptcy Court, Southern District of New**  
27 **York, One Bowling Green, Courtroom 621, New York, New York 10004, on November 12,**  
28 **2009 2 p.m. EST ("Hearing Date")** or as soon thereafter as counsel can be heard, upon Movant's

1 request for entry of an Order granting the following:

2 (i) relief from the automatic stay concerning **Motors Liquidation Company f/k/s**  
3 **General Motors Corporation** ("Debtors") and Debtors' bankruptcy estates, as it relates to  
4 Movant;

5 (ii) permission to proceed under applicable non-bankruptcy law to prosecute  
6 Movant's personal injury claim against Debtors to its conclusion, but to enforce any award  
7 rendered only against Debtors' available insurance proceeds;

8 (iii) that the Order be binding and effective despite any conversion in this bankruptcy  
9 case to a case under any other Chapter of Title 11 of the United States Code.

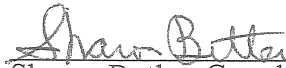
10 (iv) for an Order, pursuant to Rule 9011(c)(1)(b) of sanctions against Debtor and Debtors'  
11 counsel.

12 **PLEASE TAKE FURTHER NOTICE**, that responses or objections, if any, to the  
13 Motion must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and  
14 Local Rules of Bankruptcy Court, and shall be filed with the Bankruptcy Court electronically,  
15 and in accordance with General Order M-242 by registered users of the Bankruptcy Court's case  
16 filing system, with a hard copy delivered directly to Chambers, and shall be served upon: (a)  
17 **Sharon Butler, Guardian ad Litem for Brooke Alexis Love, a minor, In Propria Persona**  
18 **for Movant, at 5990 Sepulveda Boulevard, Suite #330, Van Nuys, California 91411-2523,**  
19 **and the Office of the United States Trustee, 33 Whitehall Street, 21<sup>st</sup> Floor, New York, New**  
20 **York 10004**, so as to be actually received no later than three (3) days prior to the Hearing Date.

21 **PLEASE TAKE FURTHER NOTICE**, that unless objections are timely filed and  
22 received by the Court, the Court may grant the relief requested herein.

23 **PLEASE TAKE FURTHER NOTICE**, that the Hearing may be adjourned from time to  
24 time without further notice other than the announcement of such adjournment in open court or by  
25 posting of such adjourned date on the Court's calendar on the aforementioned date.

26 DATED: October 23, 2009

  
Sharon Butler, Guardian ad Litem for  
Brooke Alexis Love, a minor  
In Propria Persona

STATE OF CALIFORNIA )  
 )  
COUNTY OF LOS ANGELES )

Chris Meyer